

THE DONG-A ILBO

CIVIL ACTION

v.

BO H. LIM a/k/a BO HYUN LIM a/k/a
DAVID LIM a/k/a LIM BO a/k/a BO LIM
a/k/a BO HI LIM a/k/a BO HYEON LIM and
KOOK JIN LEE a/k/a KUK JIN LEE a/k/a
KOOK J. LEE a/k/a KOOKJIN LEE a/k/a
KOO J. LEE a/k/a KOK J. LEE a/k/a KOOK
LEE a/k/a KOOK JUN LEE a/k/a PETER
LEE and THE KOREAN DAILY TRIBUNE,
INC. a/k/a KOREAN DAILY TRIBUNE,
INC. a/k/a DONG-A DAILY NEWS,
PHILADELPHIA, INC. a/k/a DONG-A
DAILY NEWS d/b/a THE CHOSUN DAILY
PHILADELPHIA d/b/a THE DONG-A
DAILY NEWS d/b/a DONG-A DAILY
NEWS, INC. and THE KOREAN
SOUTHEAST NEWS, INC. a/k/a KOREA
SOUTHEAST NEWS a/k/a THE
SOUTHEAST NEWS, INC. d/b/a DONGA
DAILY NEWS LLC d/b/a THE CHOSUN
DAILY NEWS-ATLANTA and STV
NETWORKS, INC.

NO. 08-cv-2399

ORDER

AND NOW, this day of 2010, it is hereby ORDERED and
DECREED that upon consideration of the within Motion of Defendants' Counsel for Leave to
Withdraw as Counsel to Defendants, David B. Lim and Korean Daily Tribune, Inc., and any
response thereto, it is hereby ORDERED that this Motion is GRANTED and Defendants'
Counsel, John Livingood, Esquire and Margolis Edelstein are discharged as Counsel for
Defendants as of this date. Defendants will represent themselves *pro se* until they retain new
Counsel.

BY THE COURT:

J.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

THE DONG-A ILBO

CIVIL ACTION

v.

BO H. LIM a/k/a BO HYUN LIM a/k/a
DAVID LIM a/k/a LIM BO a/k/a BO LIM
a/k/a BO HI LIM a/k/a BO HYEON LIM and
KOOK JIN LEE a/k/a KUK JIN LEE a/k/a
KOOK J. LEE a/k/a KOOKJIN LEE a/k/a
KOO J. LEE a/k/a KOK J. LEE a/k/a KOOK
LEE a/k/a KOOK JUN LEE a/k/a PETER
LEE and THE KOREAN DAILY
TRIBUNE, INC. a/k/a KOREAN DAILY
TRIBUNE, INC. a/k/a DONG-A DAILY
NEWS, PHILADELPHIA, INC. a/k/a
DONG-A DAILY NEWS d/b/a THE
CHOSUN DAILY PHILADELPHIA d/b/a
THE DONG-A DAILY NEWS d/b/a
DONG-A DAILY NEWS, INC. and THE
KOREAN SOUTHEAST NEWS, INC. a/k/a
KOREA SOUTHEAST NEWS a/k/a THE
SOUTHEAST NEWS, INC. d/b/a DONGA
DAILY NEWS LLC d/b/a THE CHOSUN
DAILY NEWS-ATLANTA and STV
NETWORKS, INC.

NO. 08-cv-2399

**MOTION OF COUNSEL OF DEFENDANTS, DAVID B. LIM,
incorr.identified as BO H. LIM a/k/a BO HYUN LIM a/k/a DAVID LIM
a/k/a LIM BO a/k/a BO LIM a/k/a BO H. LIM a/k/a BO HYEON LIM
and KOREAN DAILY TRIBUNE, INC. incorrectly identified as KOREAN
DAILY TRIBUNE, INC. a/k/a KOREAN DAILY TRIBUTE, INC. a/k/a
DONG-A DAILY NEWS, PHILADELPHIA, INC. a/k/a DONG-A DAILY NEWS
a/k/a THE CHOSUN DAILY PHILADELPHIA d/b/a THE DONG-A DAILY NEWS
d/b/a DONG-A DAILY NEWS, INC. FOR LEAVE TO WITHDRAW AS COUNSEL**

Defendants' counsel, John A. Livingood, Jr., Esquire and Margolis Edelstein, bring this
Motion for Leave to Withdraw as Counsel of Defendants in the above-captioned matter and in

support thereof aver as follows:

1. On or about September 8, 2008, Defendant, David B. Lim, on his own behalf and on the behalf of the Korean Daily Tribune, Inc., incorr. identified as Korean Daily Tribune, Inc. a/k/a Korean Daily Tribute, Inc. a/k/a Dong-A Daily News, Philadelphia, Inc. a/k/a Dong-A Daily News a/k/a The Chosun Daily Philadelphia d/b/a The Dong-A Daily News d/b/a Dong-A Daily News, Inc., entered into an Attorney-Client relationship with the firm of Margolis Edelstein to defend Defendants in the above-captioned matter.

2. Thereafter, on or about October 15, 2008 Counsel filed a Motion to Dismiss on behalf of the Defendants.

3. On or about October 22, 2008, Plaintiff filed its First Amended Complaint.

4. On or about November 6, 2008, moving counsel filed a Motion to Set Aside Default Judgment against Defendant, David Lim.

5. On or about January 29, 2009, counsel filed a Motion to Dismiss on behalf of the Defendants.

6. Defendant, David B. Lim has advised Counsel of his intention to file for bankruptcy protection.

7. A Suggestion of Bankruptcy was filed on September 11, 2009.

8. The above matter has been stayed pursuant to Section 362 of the Bankruptcy Code provides that a petition filed under the Bankruptcy Code operates as an automatic stay of "... any act to collect, assess, or recover a claim against the debtor that arose before the commencement of the case". 11 U.S.C. § 362(a)(6).

9. As a result of this stay, Defendants' Counsel will be unable to provide

Defendants with further legal services in this litigation.

10. A copy of this Motion has been served upon Defendants and opposing Counsel on this date via regular mail notifying them of our intent to withdraw as Counsel.

11. Defendant, David Lim, individually and on behalf of Korean Daily Tribute, Inc. does not oppose this Motion.

WHEREFORE, Counsel for the Defendants respectfully requests that this Court enter the proposed Order attached hereto, granting the within Motion for Leave to Withdraw as Counsel to Defendants in this action.

Respectfully submitted,
MARGOLIS EDELSTEIN

BY:  /JL740

John A. Livingood, Jr., Esquire
Attorney for Defendants, David B. Lim, incorr.
identified as Bo H. Lim a/k/a Bo Hyun Lim a/k/a
David Lim a/k/a Lim Bo a/k/a Bo Lim a/k/a Bo H.
Lim a/k/a Bo Hyeon Lim and Korean Daily
Tribune, Inc., incorr. identified as Korean Daily
Tribune, Inc. a/k/a Korean Daily Tribute, Inc. a/k/a
Dong-A Daily News, Philadelphia, Inc. a/k/a
Dong-A Daily News a/k/a The Chosun Daily
Philadelphia d/b/a The Dong-A Daily News d/b/a
Dong-A Daily News, Inc.

I.D. No. 68996/Telephone #: 215-931-5868
The Curtis Center, 170 S. Independence Mall W.
Suite 400E, Philadelphia, PA 19106-3337

THE DONG-A ILBO

CIVIL ACTION

v.

BO H. LIM a/k/a BO HYUN LIM a/k/a
DAVID LIM a/k/a LIM BO a/k/a BO LIM
a/k/a BO HI LIM a/k/a BO HYEON LIM, et
al.

NO. 08-cv-2399

CERTIFICATE OF SERVICE

I, JOHN A. LIVINGOOD, JR., ESQUIRE, do hereby certify that a true and correct copy of Motion to Withdraw as Counsel for Defendants, David Lim and Korean Daily Tribune, Inc. was sent to counsel below named via United States Mail, postage pre-paid on March 17, 2010:

David J. Averett, Esquire
7719 Castor Avenue
2nd Floor
Philadelphia, PA 19152

Chull Sook Park, Esquire
The Park Law Group, LLC
23 S. Warren Street
2nd Floor
Trenton, NJ 08608

Yung Wang Lee, Esquire
Law Offices of Young K. Park
2009 Chestnut Street
Philadelphia, PA 19103

David B. Lim
13135 Hidden Acres Lane
Bishopville, MD 21813

MARGOLIS EDELSTEIN

BY: 

/JL740

John A. Livingood, Jr., Esquire
Attorney for Defendants,
David B. Lim and Korean Daily Tribune, Inc.